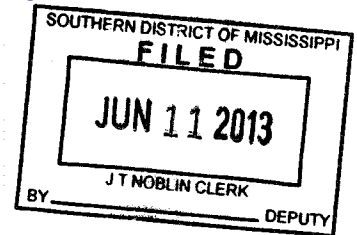


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13cv25116-JMR

AARON F. BROUSSARD, DANIEL ABEL,  
CHARLES LEARY, VAUGHN PERRET,  
CHRIS YOUNT, TROUT POINT LODGE  
LIMITED, NOVA SCOTIA ENTERPRISES, LLC

DEFENDANTS

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NOTICE OF REMOVAL

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YOU ARE HEREBY NOTIFIED that Defendants, Charles Leary, Vaughn Perret, and Trout Point Lodge Limited, have removed this action from the Circuit Court of Hancock County, Mississippi to the United States District Court for the Southern District of Mississippi, Southern Division. In support of its Notice of Removal, Defendants state:

I.

This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1332, 1441 and 1446.

II.

This action was originally commenced by Plaintiff, Douglas Handshoe, on May 21, 2013 by the filing of the Complaint in the Circuit Court of Hancock County, Mississippi styled *Douglas Handshoe v. Aaron Broussard, Daniel G. Abel, Charles Leary, Vaughn Perret, Chris Yount, Trout Point Lodge Limited, Nova Scotia Enterprises, LLC*, Cause No: 13-0186. The Summons and Complaint were served on Defendants by service of process upon Charles Leary,

Vaughn Perret, and Charles Leary on behalf of Trout Point Lodge Limited on June 4, 2013. Pursuant to 28 U.S.C. § 1446(a) a true and correct copy of all process and pleadings served upon Defendants is attached as Exhibit "A"

III.

Pursuant to 28 U.S.C. § 1446(b) this Notice of Removal is being filed and served within 30 days of first receipt by these Defendants, through service or otherwise, of a copy of the initial pleadings setting forth the claim for relief upon which Plaintiff's claims are based.

A complete certified copy of the record on file in Cause No: 13-0186 in the Circuit Court of Hancock County, Mississippi will be separately filed electronically in accordance with L.U.Civ.R. 5(b) within 14 days from the date of removal.

IV.

In the original Complaint Plaintiff names Aaron F. Broussard, Daniel G. Abel, Charles Leary, Vaughn Perret, Chris Yount, Trout Point Lodge Limited, and Nova Scotia Enterprises, LLC as the Defendants. Complete diversity exists between the parties since Plaintiff is an adult resident citizen of Hancock County, Mississippi; Defendant, Aaron F. Broussard, is an adult resident citizen of the Jefferson Parish, Louisiana; Defendant, Daniel G. Abel is an adult resident citizen of Jefferson Parish, Louisiana; Defendant, Chris Yount is an adult resident citizen of Jefferson Parish, Louisiana; Defendant Charles Leary is an adult resident citizen of Nova Scotia, Canada; Defendant Vaughn Perret is an adult resident citizen of Nova Scotia, Canada; Defendant, Trout Point Lodge Limited is a Canadian corporation organized and existing in Nova Scotia, Canada with its principal place of business in Nova Scotia, Canada; and. Nova Scotia Enterprises, LLC is a Louisiana limited liability company organized in Jefferson Parish, Louisiana and which had its principal place of business in Jefferson Parish, Louisiana until its

only limited liability company member, Roy D'Aquila of Jefferson Parish, Louisiana, passed away in January 2012. Mr. D'Aquila's estate has been opened in Jefferson Parish, Louisiana; and his widow, Linda D'Aquila, of Jefferson Parish, Louisiana has been appointed by the Court as Administratrix.

V.

Defendants, Aaron F. Broussard, Daniel G. Abel, Chris Yount, Nova Scotia Enterprises, LLC consent to this removal and join in this removal.

VI.

This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. §§1332 and 1441. At the time of the filing of the Complaint and at all times thereafter complete diversity of citizenship has existed between the Plaintiff and Defendants.

VII.

The Plaintiff demands judgment against Defendants for an unspecified amount of money for damages allegedly suffered in an amount exceeding \$75,000.00 exclusive of interest and costs. The nature of Plaintiff's claims and statements he has made in pleadings in other cases and over the internet indicate that.

VIII.

Pursuant to 28 U.S.C. § 1441(a) the United States District Court for the Southern District of Mississippi, Southern Division, is the federal district court for the district and division embracing the place where the state court action was originally filed and pending.

IX.

Pursuant to 28 U.S.C. § 1446(d) Plaintiff is being provided with a copy of this Notice of Removal, and a copy of this Notice of Removal is being filed with the Clerk of the Circuit Court of Hancock County, Mississippi.

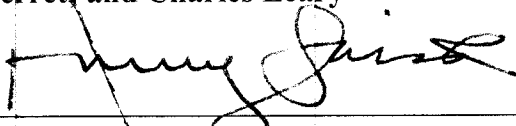
X.

Consistent with the provision of 28 U.S.C. § 1446(d) no further proceedings shall be had in this matter in the Circuit Court of Hancock County, Mississippi.

Respectfully submitted this the 11 day of June, 2013.

**Trout Point Lodge, Limited; Vaughn  
Perret; and Charles Leary**

By:

  
Henry Laird, MS Bar No. 1774

**CERTIFICATE OF SERVICE**

I, Henry Laird, do hereby certify that I have sent a true and correct copy of the foregoing  
Notice of Removal to the following:

Douglas Handshoe  
214 Corinth Drive  
Bay St. Louis, Mississippi 39520

This the 11 day of June, 2013.

  
Henry Laird

Henry Laird (MSB No. 1774)  
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